

April 14, 2011

To be sent by email to: brc@nuclear.energy.gov

Dear Mr. Frazier:

Thank you for your email notifying us of the Commission's *What We Heard* staff report, and the invitation to comment. We appreciate this opportunity.

We understand that the report: 1) is meant as a summary of comments and presentations that the Commission received; 2) did not attempt to recount each comment that the Commission received; and 3) does not necessarily mean that the Commission will incorporate any point of view presented in its own recommendations. Within the boundaries of those guidelines, we believe that the *What We Heard* report is a fair and accurate summary of the diverse viewpoints that the Commission received.

We are re-sending our own comments, delivered in June 2010 before the Commission meeting at Hanford. We reiterate all of our recommendations, but wish to emphasize two that seem particularly relevant to the staff report and recent events:

Our first recommendation is that the Commission seriously consider a National Stakeholder Forum as a method for encouraging broad public participation in atomic waste disposition decisions. The *What We Heard* report included the following phrase, which seemed very similar to language that the chairs of nine U.S. Department of Energy (DOE) site specific advisory boards used in their joint letter to DOE (quoted in our attached comments), recommending that the Department sponsor a National Stakeholder Forum: "Whatever [atomic waste disposition] approach is ultimately accepted, it must be socially acceptable, technically sound, environmentally responsible, economically feasible and sustainable across generations." (*What We Heard*, p. 16) We therefore assume that we were not the only organization to recommend the concept of a National Stakeholder Forum to the Commission.

Our sixth recommendation is that the Commission's own recommendations will not be credible if they include measures that continue to socialize the atomic industry's costs and management of its wastes. Events at the Fukushima plant in Japan have reinforced that recommendation, and have drawn other numerous comments on the Commission's web pages calling for a limited future for atomic energy. Fukushima appears destined to join Chernobyl as a reactor accident making areas of land uninhabitable for years because of radioactive contamination. Moreover, the accidents and their aftermath reinforce this technology's financial costs: at least four reactors (nearly a tenth of Japan's operating atomic power plants) will never operate again, must be decontaminated and decommissioned, and melted reactor fuel must be stored and managed for millennia to limit further human exposure. In addition, under laws in Japan and the U.S., and perhaps other nations, liability costs of a major accident are limited for reactor operators, with amounts over those limits likely to fall ultimately upon the federal government.

We therefore wish to endorse the position of national Physicians for Social Responsibility, in recommending the elimination of federal support to new reactors, especially loan guarantees, and recommend that those funds be shifted to energy efficiency improvements and safe, clean renewable energy sources that are sustainable.

Thank you again for the opportunity to comment. Please contact us if you have any questions on this material.

Sincerely,

Cherie Eichholz, Executive Director
Washington State Chapter of Physicians for Social Responsibility

Kelly Campbell, Executive Director
Oregon Physicians for Social Responsibility

John Abbotts
Member, Hanford Task Force, Washington Physicians for Social Responsibility